

20.05.2020

Nemo for the appellant. Adjourned. To come up for preliminary hearing on 04.06.2020 before S.B. Notice be issued to the appellant and his counsel.


(M. AMIN KHN KUNDI)
(MEMBER-J)

04.06.2020

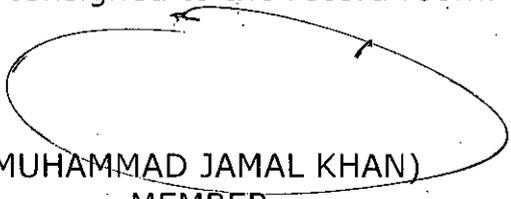
Counsel for the appellant present.

Requests for adjournment in order to further prepare the brief. Adjourned to 22.07.2020 before S.B.


Chairman

22.07.2020

Mr. Noor Muhammad Khattak, Advocate for the appellant, is present. He submitted that the grievance of the appellant has been addressed and accordingly he has been instructed by the client to withdraw the instant appeal. The appeal is accordingly withdrawn and disposed of. File be consigned to the record room.


(MUHAMMAD JAMAL KHAN)
MEMBER

ANNOUNCED
22.07.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 3322 /2020

AAMIR NABI

VS

HEALTH DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of writ petition	1- 3.
2.	Advertisement	A	4.
3.	Appointment order	B	5.
4.	Medical certificate	C	6.
5.	Verification letter	D	7.
6.	Service book	E	8.
7.	Letters	F	9- 10.
8.	Attendance	G	11- 27.
9.	Departmental appeal	H	28.
10.	Vakalat nama	29.

APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. 3322 /2020

Diary No. 2660

Mr. Amir Nabi, Dental Technician (BPS-12),
O/O Medical Superintendent, Farid Khan Shaheed,
District Headquarter Hospital, Hangu

Dated 24/04/2020

APPELLANT

VERSUS

- 1- The Secretary Health Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Health Services Department, Warsak Road, Khyber Pakhtunkhwa, Peshawar.
- 3- The Medical Superintendent, Farid Khan Shaheed, District Headquarter Hospital, Hangu.
- 4- The District Accounts Officer, District Hangu.

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE INACTION OF THE RESPONDENTS BY
NOT RELEASING MONTHLY SALARIES OF THE
APPELLANT W.E.F. 27.6.2019 TILL DATE AND
AGAINST NO ACTION TAKEN ON THE
DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE
STATUTORY PERIOD OF NINETY DAYS

Filed to-day


Registrar

24/4/2020

PRAYER:

That on acceptance of this appeal the respondents may kindly be directed to release monthly salaries of the appellant w.e.f. 27.6.2019 till date. Any remedy which this august Court deems fit may also be awarded in favor of appellant.

R/SHEWETH:

ON FACTS:

- 1- That the respondent No.3 issued advertisement for filling up various posts including the post of Dental technician (BPS-12). That the appellant having the requisite qualification for the post of Dental Technician (BPS-12) applied for the said post and after participated in the written test and interview the appellant was appointed against the said post vide order dated 27.6.2019. Copies of the advertisement and appointment order are attached as annexure

..... **A & B.**

- 2- That in response to the said appointment order dated 27.6.2019 the appellant submitted his arrival report vide dated 27.6.2019 and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copies of the Medical certificate, verification and service book are attached as annexure **C, D & E.**
- 3- That after arrival the appellant started performing her duties quite efficiently and up to the entire satisfaction of his superiors. That inspite of regular performance of duty salaries of the appellant has not been released and when the appellant visited the concerned quarter for the release of his salaries. That in response the appellant was handed over the letter dated 21.10.2019 whereby due to political interference the salaries of the appellant have been withheld. Copies of the letters and attendance are attached as annexure **F & G.**
- 4- That appellant feeling aggrieved from the inaction of the respondents filed Departmental appeal vide dated 20.12.2019 for the release of his salaries but no reply has been received so far. Copy of the Departmental appeal is attached as annexure **H.**
- 5- That having no other remedy the appellant filed this instant appeal on the following grounds amongst the others.

GROUND:

- A- That the inaction of the respondents by not releasing the monthly salaries of the appellant w.e.f. 27.6.2019 till date is against the law, facts, norms of natural justice and materials on the record.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the respondent Department acted in arbitrary and malafide manner by not releasing the monthly salaries of the appellant w.e.f. 27.6.2019 till date.
- D- That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- E- That the documents of the appellant have properly been verified by the respondents from the quarter concern but

inspite of that the respondents are not willing to release the monthly salaries of the appellent.

- F-** That the respondent Department also violated the principle of "WORK DONE MUST PAID" by not releasing the monthly salaries of the appellent.
- G-** That the inaction of the respondents by not releasing the monthly salaries of the appellent w.e.f. 27.6.2019 till date is politically motivated.
- H-** That the appellent seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that appeal of the appellent may be accepted as prayed for.

Dated 22.3.2020

APPELLANT


AAMIR NABI

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

**OFFICE OF THE MEDICAL SUPERINTENDENT
FARID KHAN SHAHEED DHO HOSPITAL HANGU**

PH 092-5621508

No. _____
DHOHQ App.

Dated _____ / _____ / 2019

APPOINTMENT ORDER

B
C

Consequent upon the approval/ recommendations of the Departmental Selection Committee in its meeting, interview held in the office of the Medical Superintendent Shaheed Farid Khan DHO Hospital Hangu on 27/05/2019, Mr. Amir Nahi S/O Torab Khan is hereby appointed as Dental Technician BPS-17 at Farid Khan Shaheed DHO Hospital Hangu, under the control of the undersigned, subject to the following terms and conditions:

Terms and Condition:

1. This order is subject to the verification of all original documents from the issuance authority production of equivalence certificate from the Khyber Pakhtunkhwa Medical Faculty Peshawar, if applicable registration from the Khyber Pakhtunkhwa Medical Faculty Peshawar.
2. He/She will initially be on probation for a period of one year under the rules extendable further for a period of one year.
3. He/She can be dispensed without any notice during the probation period if his/her work or his/her conduct found unsatisfactory.
4. He/She will be governed by the Govt of Khyber Pakhtunkhwa Civil Servant Act 1973 and the laws applicable to the civil servants under the rules made there under.
5. He/She will be entitled to annual increment as per existing policy.
6. He/She will produce medical fitness certificate issued by the Medical Superintendent No. 1 A DA is admissible for joining the duty.
7. He/She will be bound to produce an affidavit on Rs.30 stamp paper that he/she will serve in present posting station and will not try to get his transfer to any other facility/station/out district and will also not pressure politically or others for their transfer etc.
8. The Appointee shall require to sign a bond on a stamp paper value Rs. 50 that he/she will serve in this Health Department Hangu for minimum period of 05 years in case of leaving within 05 years then he/she will deposit Rs. 500,000/- in Govt Treasury.
9. The appointee shall be bound to perform any duty assigned by the undersigned as per Govt rules.
10. If he wishes to resign at any time, one month notice or one month salary in lieu thereof will be deposited in Govt Treasury.

If he/she accepts the above mentioned terms & conditions he/she should report to the undersigned within 14 days of the receipt of this office order and submit original documents along with one set of photocopy for verification from the concerned board/university/medical faculty, if applicable, in case he/she fails to report for duty within stipulated period of time, this appointment order will automatically stand cancelled and the next candidate in the merit list (waiting) will be considered for appointment.

Medical Superintendent
Shaheed Farid Khan DHO
Hospital Hangu
Dated 27/05/2019

No. 1242-15 MS(H) Appointment
Copy forwarded to the following for information:

1. Director General Health Services, Govt of Khyber Pakhtunkhwa Peshawar
2. District Account Officer Hangu.
3. Establishment/Accounts of this office
4. Official concerned

Medical Superintendent
Shaheed Farid Khan DHO
Hospital Hangu

ATTESTED
M

c-6

MEDICAL CERTIFICATE

MR. *Abdul Nabi*

Abdul Nabi

Parid Khan

Parid Khan

25 July 1945



Name of candidate
Identification
Official
of the office

[Signature]

Total of office

I hereby certify that I examined physically *Mr. Abdul Nabi*,
Parid Khan, a candidate for employment in the office of
Health and could not discover that he/she has any disease
contagious or other constitutional affection or bodily infirmity except

I do not consider this as disqualification for employment in the office of the
Health

His/her age according to his/her own statement is *24* years & *2* months and by
external/physical appearance he/she is about *24* years & *2* months

LEFT HAND THUMB AND FINGERS
IMPRESSIONS.....

[Signature]
Medical Superintendent
Parid Khan District DHQ
Hospital Hangu.

ATTESTED
[Signature]



No. VSS/FPMA/Ver/Sec

Dated: 17/12/19

To: The Medical Superintendent
 Shaheed Farid Khan DHQ,
 Hospital Hangu

Subject: VERIFICATION

Memo: Reference your letter No. 1436/DHQH/Medical dated 10/07/2019 on the subject noted above.

The particulars of the following Diploma's have been checked with the official record and the remarks are as under.

S.No	Name	Father Name	Technology	Roll No	Session	Remarks
01	Adnan Haider	Noor Ghulam Haider	Pathology	42482	01-2018	VERIFIED
02	Abdul Qadir	Wali Zad Shah	Pathology	50022	02-2011	VERIFIED
03	Aamir Nabi	Tarab Khan	Dental	51725	12-2015	VERIFIED
04	Muhammad Shafiq	Zalib Gul	Dental	51477	01-2017	VERIFIED
05	Abdullah	Abdul Jabar	Dental	30838	01-2017	VERIFIED
06	Muhammad Kashif Ullah	Khurshid Sultan	Surgical	42540	01-2018	VERIFIED
07	Aiman	Abdul Sattar	Surgical	51955	01-2017	VERIFIED
08	Amir Ullah	Mirza Khan	Radiology	22145	07-2018	VERIFIED

Prepared by: (Anwar Zeb) [Signature] Checked by: (Shahid) [Signature] Verified by: (Khalid Muhammad) [Signature]

Sign based on above verification.

[Signature]

[Signature]
 Chief Executive Officer,
 Faculty of Paramedical & Allied Health
 Sciences, Khyber Pakhtunkhwa [Signature]

Note:

- i) This letter has official FPMA Seal.
- ii) The Original Diplomas of Session 01-2017 onwards is having Water Mark.
- iii) The employment authority advised to check on FPMA official website also.

ATTESTED

MEDICAL SUPERINTENDENT
 Shaheed Farid Khan
 Hospital Hangu

1. Certificates for verification.
2. DMC must be sent to Assistant Controller, Secrecy.

[Signature]

[Signature]
 Assistant Secretary (Certificates)
 BISE Kohat

ATTESTED

[Signature]

- E-8
4. Name and Residence _____
5. Date of birth by Christian era as nearly as can be ascertained _____
6. Exact height by measurement _____
7. Personal mark of identification _____
8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)
 (دستی صورتیں اور دائیں اور بائیں ہاتھوں کی صورتیں)

Little Finger (چوٹی)	Ring Finger (انگوٹھ)	Middle Finger (اگلی ہتھ)
Fore Finger (پہلی ہتھ)	Thumb (انگوٹھ)	

9. Signature of Government Servant _____
10. Signature and designatin of the Head of the Officer or other Attesting Officer _____

(تصدیق کنندہ دفتر کے اختتام اور غیر)

Note: The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 hears under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے لیے تاریخ لکھنی چاہیے۔ انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

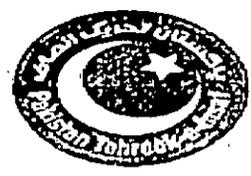
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Annexure "C"

Shah Faisal Khan

MEMBER PROVINCIAL ASSEMBLY
KHYBER PAKHTUNKHWA
MPA PK-83 CHAIRMAN DDAC HANGU
☎ 0925-621340 ☎ 0331-9292917

Q-D
F-9



No. 125 DDAC/Hangu

Dated: 21/10/2019

To
The District Accounts Officer,
Hangu.

Subject: NON PROCESSING OF SALARY DOCUMENTS OF NEWLY APPOINTED CANDIDATES OF SHAHEED FARID KHAN DILLO HOSPITAL HANGU MADE BY MS HALEEM UR REHMAN.

Dear Sir!

Reference your office letter No. DAO/HU/Admn/2019-20/1988 dated 20-09-2019 on the above noted subject.

It is apprised the Chief Minister Khyber Pakhtunkhwa has already directed Secretary Health to conduct inquiry, copy of the CM Directive is enclosed herewith.

It is therefore, requested that the case may be kept pending till the report of inquiry officer and the direction by the Chief Minister Khyber Pakhtunkhwa.

[Signature]
SHAH FAISAL KHAN
CHAIRMAN DDAC
MPA-83 HANGU

Zilhoor
2
3/11

[Signature]

ATTESTED
[Signature]

OFFICE OF THE MEDICAL SUPERINTENDENT,
FARID KHAN SHAHEED DHO HOSPITAL, HANGU

06 Annexure "D"

OFFICE OF THE DISTRICT ACCOUNTS OFFICE HANGU

NO. DAO/HR/2019-20/1887

dated: 25/8/2019

The Accountant General
Khyber Pakhtunkhwa
Peshawar.

10

Subject: Possessing of source-I/salary of newly appointed candidates of
Shaheed Farid Khan DHO Hospital Hangu.

Memo:

Kindly refer to the subject noted above.

The MS Shaheed Farid Khan DHO Hospital Hangu has been appointed
15 numbers of employees in various cadres and submitted source-I along
with service books to this office for activation of pay.

It is for your kind informations that Mr. Shah Faisal Khan chairman
EDCA/MPA KPK Pk-83 has intimated to this office that the appointments
have been mad by the MS Hangu are illegal, without the consent of under
signed. The commissioner Kohat division kohat has already ordered enquiry
to dig out the facts in this regards. Therefore till the completion of enquiry
the documents of newly appointed candidates may not be processed/kept
pending (copy attached).

It is further stated that this office returned all the source-I of newly
appointed candidates with certain observations. (Copy of observation
attached for ready reference please).

In the above circumstances this office may please be guided that the
pay of the newly appointees will be processed after completion of all
observations raised by this office except at S No-6 or other wise.

1/25/19

q

MA

2018
District Accounts Officer
Hangu

Attendance Register

for the month of

November - 2019

SUBJECT

YEAR

Sl No.	Name	SUBJECT																	YEAR											Current month's attendance	Previous month's attendance	Total attendance	Remarks	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28					29
FCG																																		
1	Mr. M. Khalil	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC	CC				
2	Mrs. Azza	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L				
EYE																																		
1	Mr. Ajmal Hussain	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
2	Mr. Abdurrahman	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A				
EPI																																		
1	Mr. M. Azeem	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
2	Mr. M. Sohail	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
3	Mr. Muzamil Khan	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
4	Mr. Naveeb	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
5	Mr. Javed	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
6	Miss. Rohina Kusrar	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P				
CLERICAL STAFF																																		
1	Mr. Saeed Akhtar	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
2	Mr. Coulab Khan	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
3	Mr. Said Ahmed	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
4	Mr. Sami ullah	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
TBC																																		
1	Shahbaz Khan	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A				

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Threatlog Training

24/11/2019 P. 1/2

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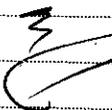
Attendance Register

for the month of November - 2019

SUBJECT _____

YEAR _____

Roll No..	Name	SUBJECT																	YEAR														Current month's attendance	Previous month's attendance	Total attendance	Remarks		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31						
	Store Keeper																																					
(1)	Mr. M. Atif	P	P	X	P	P	P	P	*			P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P					
(2)	Mr. Akhter Naeem	P	P	X	P	P	P	P	P			P	P	P	P	P		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P					
3	Saeed ur Rehman (DHS)																																					


ATTES TED

(12)

Attendance Register

December / Para-medical Staff

for the month of December 2019.

SUBJECT

YEAR

Oil No..	Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month's attendance	Previous month's attendance	Total attendance	Remarks			
Nurses																																							
(1)	Mehtab Kumari	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(2)	Mrs. Doleem Jaine	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(3)	Mrs. Rabia Inlas	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(4)	Mrs. Shagufta Parbi	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(5)	Miss. Monica	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(6)	Mrs. Saima Sadov	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(7)	Mrs. Anthly Magyan	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(8)	Mrs. Salma	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(9)	Mrs. Sameera	Maternity leave w.e.f -																																					
(10)	Mrs. Bushra	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
Male Nurses																																							
(1)	Mr. Shoaib	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(2)	Mr. Nawaz ulah	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(3)	Mr. Zahid Rehman	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(4)	Mr. Wazir Mamoon	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(5)	Mr. Nomoon	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				
(6)	Mr. Sulman Jacob	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off				

ATTESTED

13

Attendance Register

for the month of

November - 2019

SUBJECT

YEAR

Sl No.	Name	SUBJECT																	YEAR										Current month's attendance	Previous month's attendance	Total attendance	Remarks				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27					28	29	30	31
Surgical																																				
11	Mr. Umair	[Handwritten marks]																	[Handwritten marks]																	
22	Mr. Hayat Wazir	[Handwritten marks]																	[Handwritten marks]																	
33	Mr. Muhammad Kashif	[Handwritten marks]																	[Handwritten marks]																	
44	Mrs. Eman	[Handwritten marks]																	[Handwritten marks]																	
	Mrs. Aiman	[Handwritten marks]																	[Handwritten marks]																	
ANESTHESIA																																				
(1)	Mr. Khalil Ahmad	[Handwritten marks]																	[Handwritten marks]																	
(2)	Mr. Fazal Mahmood	[Handwritten marks]																	[Handwritten marks]																	
(3)	Miss. Sumaira	[Handwritten marks]																	[Handwritten marks]																	
DENTEL																																				
(11)	Mr. Mubasir	[Handwritten marks]																	[Handwritten marks]																	
22	Mr. Wali ullah	[Handwritten marks]																	[Handwritten marks]																	
33	Mr. Amir Nabi	[Handwritten marks]																	[Handwritten marks]																	
44	Mr. Abdullah	[Handwritten marks]																	[Handwritten marks]																	
55	Mr. M. Shafiq	[Handwritten marks]																	[Handwritten marks]																	
66	Mr. Asmat ullah	[Handwritten marks]																	[Handwritten marks]																	
PHYSIOTHERAPY																																				
1)	Mr. M. Hikman	[Handwritten marks]																	[Handwritten marks]																	

ATTESTED

(15)



Attendance Register

for the month of October 2019

SUBJECT _____

YEAR _____

Sl No..	Name	SUBJECT																	YEAR											Current month's attendance	Previous month's attendance	Total attendance	Remarks		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28					29	30
	X-RAY-STTAF																																		
1	Mr. Bilal Ahmed	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P							
	Mr. Waseem	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P									
	Mr. Arij ullah	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P									
	Mr. Inayid Whom	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	X	P	P	P										
	SURGICAL																																		
1	Mr. Umair	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
2	Mr. Hayat Wazir	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P									
3	Mr. M. Khafri	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P									
4	Miss Amain	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off										
	ANESTHESIA																																		
1	Mr. Khalil Ahmed	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
2	Mr. Fazal Mehmood	P	P	P	P	X	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P									
3	Miss. Sumaira	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S									
	DENTAL																																		
1	Mr. Mubasbat	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
2	Mr. Wali ullah	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
3	Mr. Amir Nabi	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
4	Mr. Abdullah	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
5	Mr. M. Shafiq	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								
	PHYSIOTHERAPY																																		
1	Mr. Muhammad Hameed	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	P	P	P								

Seen
Wahab
19/10/19

(17)



Attendance Register

Dec. 2019

for the month of

December 2019.

SUBJECT

YEAR

Sl No..	Name	SUBJECT																	YEAR										Current month's attendance	Previous month's attendance	Total attendance	Remarks									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27					28	29	30	31					
	ECC																																								
1)	Mr. M. Khalil	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
2)	Mr. Azra	Maximum leave																																							
	EYE																																								
1)	Ms. Aijmal Hussain	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
	Mr. Abdurhaman	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
	EPI																																								
1)	Mr. M. Azeez	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
2)	Mr. M. Shahid	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
3)	Mr. Muzamir Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
4)	Mr. Naveed	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
5)	Mr. Tawad	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
6)	Mrs. Rohina Kusun	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
	clerical staff																																								
1)	Mr. Saeed Akhtar	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
2)	Mr. Gulab Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
3)	Mr. Saad Ahmad	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
4)	Mr. Sami Ullah	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										
	TBC																																								
1)	Shahbaz Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙										

10

Attendance Register January

for the month of _____

SUBJECT _____

YEAR _____

Roll No..	Name	SUBJECT																	YEAR											Current month's attendance	Previous month's attendance	Total attendance	Remarks			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28					29	30	31
ECG																																				
(1)	MY. M. Khalid	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(2)	Mrs. Azra	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
EYE																																				
(1)	MY. Aimal Hussain	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(2)	MY. Abdurrahman	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
EPI																																				
(1)	MY. M. Azeem	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(2)	MY. M. Sohail	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(3)	MY. Muzamil Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(4)	MY. Naveeb	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(5)	MY. Javeed	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(6)	Mrs. Poheena Khatun	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
Clerks																																				
(1)	MY. Saeed Akhtar	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(2)	MY. Zubair Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(3)	MY. Said Ahmad	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
(4)	MY. Sami Ullah	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					
TB.D																																				
(1)	MY. Shahbaz Khan	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙	⊙					

23

Attendance Register February - 20

for the month of Feb - 20

SUBJECT

YEAR

Roll No..	Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month's attendance	Previous month's attendance	Total attendance	Remarks						
Nurses																																										
(1)	Mrs. Mehtab Kumari	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off							
(2)	Mrs. Poleen James	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(3)	Mrs. Rabia Inhas	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(4)	Mrs. Shaqufa Bibi	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(5)	Miss. Monica	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(6)	Mrs. Saima Sadiq	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(7)	Mrs. Anshly Maryam	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(8)	Mrs. Salma	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(9)	Mrs. Samceya	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(10)	Mrs. Bushra	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
Male Nurses																																										
(11)	Mr. Shoab	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(12)	Mr. Naveed Ullah	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(13)	Mr. Zahid Rehman	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(14)	Mr. Wazir Mamon	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(15)	Mr. Noman	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						
(16)	Mr. Salman Jacob	Transferred -> Rehman																																								
(17)	Mr. Hidayat Ali	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off	off						

ATTESTED

26

Attendance Register

Feb-20

for the month of

Feb. 20

SUBJECT

YEAR

Roll No..	Name	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Current month's attendance	Previous month's attendance	Total attendance	Remarks	
	Surgical	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W					
1)	MR. Umair	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
2)	MR. Hayat Wazir	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
3)	MR. M. Kashif	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
4)	MRS. Eman	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
	Anesthesia	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
1)	MR. Khalil Ahmad	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
2)	MR. Fazal Mehmood	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
3)	MRS. Sumaira	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
	Dental	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
1)	MR. Mubasir	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
2)	Mrs. Wali ullah	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
3)	MR. Amir Nabi	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
4)	MR. Abdullah	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
5)	MR. Shafiq	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
6)	MR. Asmat ullah	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
	Physiotherapy	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				
1)	MR. M. Hikman	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W	W				

(17)

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VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

3322 OF 2020

Amir Nabi (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Health Deptt. (RESPONDENT)
(DEFENDANT)

I/We Amir Nabi

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___/___/2020

Amir Nabi

CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK
SHAHZULLAH YOUSAFZAI

&
MIR ZAMAN SAFI
ADVOCATES

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Warsak Road, Peshawar.
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